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REMARKS

The Office action has been carefully considered. The Office action rejected claims 1- 25 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,405,192 B1 to Brown et al. ("Brown"). Further claims 1-25 are also rejected under 35 U.S.C. §103(a) as being unpatentable over Brown in view of U.S. Patent No. 6,834,372 B1 to Becker et al. ("Becker"). Further yet, The Office action objected to claims 1 and 13 for grammatical mistakes. Claims 1 and 13 have been amended to obviate the grammatical mistakes. Regarding the rejections, applicants respectfully disagree.

By present amendment, claims 1, 13, 22, and 25 have been amended for clarification and not in view of the prior art. Applicants submit that the claims as filed were patentable over the prior art of record, and that the amendments herein are for purposes of clarifying the claims and/or for expediting allowance of the claims and not for reasons related to patentability. Reconsideration is respectfully requested.

Applicants thank the Examiner for the interview held (by telephone) on February 2, 2005. During the interview, the Examiner and applicants' attorney discussed the claims with respect to the prior art. The essence of applicants' position is incorporated in the remarks below.

Prior to discussing reasons why applicants believe that the claims in this application are clearly allowable in view of the teachings of the cited and applied references, a brief description of the present invention is presented.

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The present invention is directed to a system and method for retrieving information about web pages before committing to downloading the web pages. A user of a browser may decide whether or not to pursue a link based on information that is displayed when the user maneuvers a cursor over the link with an input pointing device. Maneuvering a cursor over a link is sometimes referred to as "mousing over" a link or "hovering" over a link. In this manner, the user of the browser may read information displayed in an information region near the moused over link in order to decide whether to pursue the link based on the displayed information, such as title, keywords, prior browsing history, or other links within the linked web page.

For example, when an initial web page is first fetched, the contents of the initial web page are parsed and displayed through a browser in a well-known manner. Then, each of the links in the initial web page is identified and then information about each of the web pages corresponding to the identified links is obtained from the web pages. This information may be stored in a separate local cache, a proxy cache, or a localized server such that the information collected for each of the linked web documents is easily retrieved. Further, historical relational information is assembled that includes at least one relationship between a user and the linked web page. Historical relational information may be a user's last visit to the linked web page, the total number of times that a user has visited the linked web page, whether the web page has changed since the user's last visit, or the likelihood, based on a user's history, that the user will find the linked page useful.

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After the fetched information about the linked web page itself and the assembling of the relational information about the linked web page is assembled, a user may maneuver a cursor, controlled by the mouse, to hover over one of the identified links. Then, an information region containing both the fetched information that was retrieved that corresponds to that particular link and the assembled historical relational information is displayed near the link. Thus, the user may make a more informed decision about whether or not to follow the link. Note that the above description is for example and informational purposes only, and should not be used to interpret the claims, which are discussed below.

§102(e) Rejections

Turning to the claims, independent claim 1, as amended, recites a client-side computer-implemented method comprising fetching a current web page, the current web page including one or more links, each link pointing to a web page, fetching information from each linked web page, the information regarding the web page to which each link points, wherein the information is stored separately from the current web page, assembling relational information based on the fetched information from each linked web page, the relational information including at least one historical relationship between the fetched information and a user of the client-side computer, displaying the current web page and, displaying an informational region in response to a cursor hovering over a particular link of the one or more links, the region including the information previously fetched regarding the web page to which the link points and the relational information previously assembled.

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The Office action rejected claim 1 as being anticipated by Brown. More specifically, the Office action contends that Brown teaches fetching a current web page, the current web page including one or more links, each link pointing to a web page. Column 2, lines 15-17, column 6, line 20, column 6, line 66 to column 7, line 2, module 610 of FIG. 6 and module 720 of FIG. 7A of Brown are referenced. Further, the Office action contends that Brown teaches fetching information regarding the web page to which each link points, wherein the information is stored separately from the current web page. Column 2, lines 15-17, and column 6, lines 21-27 of Brown are referenced. Further yet, the Office action contends that Brown teaches assembling relational information based on the fetched information, the relational information including at least one relationship between the fetched information and a user of the client-side computer, displaying the current web page. Column 2, lines 15-17, column 6, lines 21-27, and column 7, lines 3-16 of Brown are referenced. Still further, the Office action contends that Brown teaches displaying the current web page. Again, Column 2, lines 15-17, column 6, line 20, and column 6, line 66 to column 7, line 2, module 610 of FIG. 6 and module 720 of FIG. 7A of Brown are referenced. Finally, with respect to claim 1, the Office action contends that Brown teaches displaying an informational region in response to a cursor hovering over a particular link of the one or more links, the region including the information previously fetched regarding the web page to which the link points and the relational information previously assembled. Column 9, lines 46-59 of Brown is referenced.

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Applicants respectfully disagree with the rejection detailed in the Office action regarding claim 1, but do not present specific disagreements herein because claim 1 has been amended to include additional recitations that are not taught by Brown. More specifically, claim 1 has been amended to recite assembling relational information based on the fetched information, the relational information including at least one historical relationship between the fetched information and a user of the client-side computer. Brown simply does not teach displaying relational information that includes at least on historical relationship between the fetched information and the user of the client-side computer.

Brown is directed, generally, to a system and method for browsing the Internet such that when a web page is being presented, a background thread is able to parse the web page for a set of links. Each web page linked to the initial web page is then retrieved and, then, also parsed for items matching a user's predetermined set of criteria. For example, a user may wish to parse each linked web page to find any reference to "puppy dogs". As such, when references are found that match the user's criteria, the initial web page is actually changed to indicate that criteria has been matched. For example, if a linked web page was found to be all about puppy dogs, the link to that web page on the initial web page may blink brightly or become larger than normal.

Notwithstanding these teachings, there is no teaching anywhere in Brown directed toward the concept of assembling historical relational information between the linked web pages and the user. Furthermore, Brown does not show any appreciation of a user's past browsing history, a user's previous visit to linked web

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pages, or a user's relationship to a linked web page, all of which are examples of the kinds of historical relational information recited in claim 1. For at least the foregoing reasons, applicants submit that claim 1 is allowable over the prior art of record.

Applicants respectfully submit that dependent claims 2-12 by similar analysis are allowable. Each of these claims depends either directly or indirectly from claim 1 and consequently includes the recitations of independent claim 1. As discussed above, Brown fails to disclose the recitations of claim 1 and, therefore, these claims are also allowable over the prior art of record. In addition to the recitations of claim 1 noted above, each of these dependent claims includes additional patentable elements.

For example, claim 6 recites that the relational information includes at least information based on a user's relationship to the web page. As discussed above, Brown simply does not teach or even show any appreciation of the concept of historical relational information let alone a user's relationship to a web page as recited in claim 6. Applicants submit that for at least this additional reason, claim 6 is allowable over the prior art of record.

Turning to the next independent claim, amended claim 13 recites a machine-readable medium having instructions stored thereon for execution by a client processor to perform a method comprising fetching a current web page, the current web page including one or more links, each link pointing to a web page, fetching information from each linked web page, the information regarding the web page to which each link points, wherein the information is stored separately from

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the current web page, assembling relational information based on the fetched
information from each linked web page, the relational information including at least
one historical relationship between the fetched information and a user of the client-
side computer, displaying the current web page, and displaying an informational
region, in response to a cursor hovering over a particular link of the one or more
links, the region including the information previously fetched regarding the web
page to which the link points and the relational information previously assembled.

The Office action rejected claim 13 as being anticipated by Brown for the
identical reasons that the Office action detailed in the rejection of claim 1. Claim 13
is directed to computer-executable instructions in a machine readable medium that
correspond to the method recited in claim 1. Therefore, the same reasons
discussed above with respect to claim 1 are also reasons why claim 13 is allowable
over the prior art of record. Thus, applicants submit that claim 13 is allowable for at
least the reasons that claim 1 is allowable over the prior art of record.

Further, applicants respectfully submit that dependent claims 14-21, by
similar analysis, are allowable. Each of these claims depends either directly or
indirectly from claim 13 and consequently includes the recitations of independent
claim 13. As discussed above, Brown fails to disclose the recitations of claim 13
and, therefore, these claims are also allowable over the prior art of record. In
addition to the recitations of claim 13 noted above, each of these dependent claims
includes additional patentable elements.

Turning to the next independent claim, amended claim 22 recites, a
computerized system comprising at least one first entity storing web pages, at least

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one second entity separate from the first entity storing information regarding the

web pages, and, at least one client, each client able to browse web pages such

that fetching of a web page having one or more linked web pages from at least one

first entity causes the fetching of information from each of the one or more linked

web pages about the one ore more linked web pages from at least one second

entity and causes the assembling of relational information based on the fetched

information, the relational information including at least one historical relationship

between the fetched information and a user of the client, the and the client further

operable such that positioning of a cursor over a link of a current web page causes

display of an informational region including information regarding a web page to

which the link points as stored on the at least one second entity and causes display

of the assembled relational information.

The Office action rejected claim 22 as being anticipated by Brown. Again,

the Office action presented identical reasons in the rejection of claim 22 as were

presented for the rejection of claim 1. Applicants respectfully disagree.

As pointed out previously, nowhere does Brown teach the concept of

assembling historical relational information between the linked web pages and the

user. Furthermore, Brown does not show any appreciation of a user's past

browsing history, a user's previous visit to linked web pages, or a user's

relationship to a linked web page, all of which are examples of the kinds of

historical relational information that is recited and claimed in claim 22. Clearly,

Brown does not show any cognizance of this concept, let alone teach the

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recitations of claim 22 as amended. For at least these additional reasons, applicants submit that claim 22 is allowable over the prior art of record.

Applicants respectfully submit that dependent claims 23-24 by similar analysis are allowable. Both of these claims depend directly from claim 22 and, consequently, include the recitations of independent claim 22. As discussed above, Brown fails to disclose the recitations of claim 22 and, therefore, these claims are also allowable over the prior art of record. In addition to the recitations of claim 22 noted above, both of these dependent claims include additional patentable elements.

Turning to the last independent claim, amended claim 25 recites a computerized system comprising, at least one first entity capable of storing web pages, at least one second entity capable of providing summaries of the web pages, wherein the summaries include at least one historical relationship between a user of the first entity and a web page stored on the first entity, at least one third entity capable of providing for a given web page stored by the first entity, a list of all links on the web page and for each of the links, the corresponding summary, provided by the second entity, and, at least one client, each able to browse web pages such that fetching of a web page from the at least one first entity causes fetching information provided by the third entity and such that positioning of a cursor over a link of a current web page causes display of an informational region including information regarding a web page to which the link points.

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The Office action rejected claim 25 as being anticipated by Brown. Again, identical reasons were given in the rejection of claim 25 as were given for the rejection of claim 1. Applicants respectfully disagree.

As discussed above, nowhere does Brown teach the concept of assembling historical relational information between linked web pages and the user. Furthermore, Brown does not even show any appreciation of a user's past browsing history, a user's previous visit to linked web pages, or a user's relationship to a linked web page all of which are examples of the kinds of relational information that is recited and claimed in claim 25. Clearly, Brown does not show any cognizance of this concept, let alone teach the recitations of claim 25, as amended. Further, Brown does not teach a first entity, a second entity, and a client as recited in claim 25. For at least these additional reasons, applicants submit that claim 25 is allowable over the prior art of record.

§103 Rejections

In addition to the §102 rejections detailed above, the Office action has rejected all pending claims under §103(a) as being unpatentable over Brown in view of Becker. More specifically, the Office action contends that Brown teaches the recitations of claims 1-25 substantially as presented above with respect to the §102 rejections. The Office action tacitly admits and correctly acknowledges that Brown does not teach relational information that includes a relationship between the fetched information and the user of the client-side computer. Certainly, as discussed above, Brown cannot be construed to teach a historical relationship between the fetched information and the user of the client-side computer.

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Nevertheless, the Office action contends that Becker does teach the concept of assembling relational information based on the fetched information such that the relational information includes at least one relationship between the fetched information and the user of the client-side computer. The Office action concludes that the recitations of claims 1, 13, 22, and 25 would have been obvious to a person skilled in the art at the time the invention was made because avoiding the pitfalls of selecting certain hyperlinks ultimately helps computer users improve their time efficiency while utilizing the Internet. Applicants respectfully disagree.

Becker, in general, discloses a system and method for presenting a certain kind of historical information about hyperlinks shown on web pages. In one disclosed method, the system accesses a database that stores past web browsing data about a particular group of users. In particular, when a user mouses over a hyperlink, the database may be accessed and certain information, such as whether or not the user has visited the web page before, may be displayed. Becker, however, does not actually teach accessing the web page to which the hyperlink is pointing. Rather, only the database of historical information is accessed. The database does not include additional information such as when the web page was last updated or if the web page is different than when the user last visited the web page. This type of historical relational information must typically be retrieved by accessing the web page. This step is not taught or suggested by Becker, (or Brown for that matter). Simply put, neither Brown nor Becker, whether considered alone or in any permissible combination at law, teach or suggest assembling relational information based on the fetched information from each linked web page,

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the relational information including at least one historical relationship between the fetched information and a user of the client-side computer as recited in independent claims 1, 13, 22, and 25.

Furthermore, applicants submit that the Examiner is using hindsight reasoning in that Brown is a system directed to displaying information about a web page as fetched from the web page and Becker is a system directed to fetching information about a web page from a database of user browsing history. A user's browsing history has nothing to do with the content of the web page itself. As such, there is no motivation to combine the teachings of Becker with the teachings of Brown. The teachings of Becker seek to reduce the unneeded accessing of web pages by assembling information in a separate database. The teachings of Brown seek to increase the accessing of web pages by fetching non-historical information from each linked web page. Simply saying that the prior art may be combined does not rise to the level of establishing a prima facie case of obviousness.

As a matter of law, obviousness may not be established using hindsight obtained in view of the teachings or suggestions of the applicants. *W.L. Gore & Assocs., Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1551, 1553, 220 USPQ 303, 311, 312-13 (Fed. Cir. 1983), cert. denied, 469 U.S. 851 (1984). To guard against the use of such impermissible hindsight, obviousness needs to be determined by ascertaining whether the applicable prior art contains any suggestion or motivation for making the modifications in the design of the prior art article in order to produce the claimed design. The mere possibility that a prior art teaching could be modified or combined such that its use would lead to the particular limitations recited in a

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claim does not make the recited limitation obvious, unless the prior art suggests the

desirability of such a modification. See *In re Gordon*, 733 F.2d 900, 902, 221

USPQ 1125, 1127 (Fed. Cir. 1984). For at least these reasons, applicants submit

that claims 1, 13, 22, and 25 are allowable over the prior art of record in response

to the §103 claim rejections.

Applicants respectfully submit that dependent claims 2-12, 14-21, and 23-

24, by similar analysis, are allowable. Each of these claims depends either directly

or indirectly from their respective independent claims (1, 13, and 22) and

consequently includes the recitations of these independent claims, respectively.

As discussed above, Brown and Becker, whether considered alone or in any

permissible combination at law, fail to teach or suggest the recitations of the

independent claims, and, therefore, these dependent claims are also allowable

over the prior art of record. In addition to the recitations of the independent claims

noted above, each of these dependent claims includes additional patentable

elements.

For at least these additional reasons, applicants submit that all the claims

are patentable over the prior art of record. Reconsideration and withdrawal of the

rejections in the Office action is respectfully requested and early allowance of this
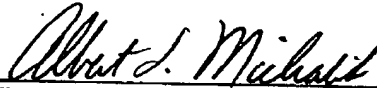
application is earnestly solicited.

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CONCLUSION

In view of the foregoing remarks, it is respectfully submitted that claims 1-25 are patentable over the prior art of record, and that the application is in good and proper form for allowance. A favorable action on the part of the Examiner is earnestly solicited.

If in the opinion of the Examiner a telephone conference would expedite the prosecution of the subject application, the Examiner is invited to call the undersigned attorney at (425) 836-3030.

Respectfully submitted,

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